1		COTT+SCOTT ATTORNEYS AT LAW LLP
2	vavar@bathaeedunne.com a	Amanda F. Lawrence (<i>pro hac vice</i>) lawrence@scott-scott.com
3	Andrew C. Wolinsky (CA 45965)	atrick J. McGahan (<i>pro hac vice</i>) mcgahan@scott-scott.com
4	awolinsky@batnaeedunne.com	Michael P. Srodoski (<i>pro hac vice</i>) srodoski@scott-scott.com
5	New York, NY 10022 1 Tel.: (332) 322-8835	56 South Main Street, P.O. Box 192 Colchester, CT 06415 Cel.: (860) 537-5537
6	Brian I. Dunne (CA 275689)	· ,
7	Edward M. Carrens and C. I.	atrick J. Coughlin (CA 111070) coughlin@scott-scott.com
8		Carmen A. Medici (CA 248417) medici@scott-scott.com
9	901 South MoPac Expressway H	Ial D. Cunningham (CA 243048) cunningham@scott-scott.com
10	Austin, TX 78746	Daniel J. Brockwell (CA 335983)
11	6	brockwell@scott-scott.com 00 W. Broadway, Suite 3300
	Interim Co-Lead Counsel for the	an Diego, CA 92101 Tel.: (619) 233-4565
12	Advertiser Classes	Additional counsel on signature page.]
13		raditional counsel on signature page.
14	UNITED STATE	S DISTRICT COURT
15	NORTHERN DIST	RICT OF CALIFORNIA
16	SAN FRANC	CISCO DIVISION
17 18	MAXIMILIAN KLEIN, et al., on behalf of themselves and all others similarly situated,	Consolidated Case No. 3:20-cv-08570-JD
19	Plaintiffs,	The Hon. James Donato
	,	ADVERTISER PLAINTIFFS'
20	V.	ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL AND
21	META PLATFORMS, INC.,	NOTICE OF LODGING PURSUANT TO CIVIL LOCAL RULE 79-5 AND THE
22	Defendant.	COURT'S STANDING ORDER FOR CIVIL CASES
23		Hearing Date: December 14, 2023
24		Hearing Time: 10:00 a.m.
25		Courtroom: 11, 19th Floor
26		
27		

Pursuant to Civil Local Rules 7-11 and 79-5, and ¶31 of the Standing Order for Civil Cases Before Judge Donato concerning "cases where voluminous or multiple administrative motions to seal would be filed if normal procedures were followed," Advertiser Plaintiffs Affilious, Inc., Jessyca Frederick, Mark Berney, 406 Property Services, PLLC, Mark Young, and Katherine Looper ("Advertiser Plaintiffs") submit this administrative motion to file under seal the unredacted versions of Advertiser Plaintiffs' Notice of Motion, Motion for Class Certification, and Memorandum in Support, as well as Exhibits 1-74 and 76-79 to the Lawrence Declaration in their entirety, Exhibits A and B to the Williams Declaration in their entirety, Exhibits A and B to the Kreitzman Declaration in their entirety, Exhibits A and B to the Fasser Declaration in its entirety. The sealed documents are listed with further detail in the below table. Pursuant to the Court's Standing Order, the reasons for sealing will be discussed in a forthcoming omnibus sealing motion, to be filed upon completion of briefing. Plaintiffs also hereby provide notice of lodging to all parties and their counsel pursuant to Civil Local Rule 79-5(e).

Document	Confidentiality	Filing Form
Notice of Motion,	Contains Information Designated Confidential by	Filed Under Seal
Motion for Class	Defendant Meta Platforms, Inc. and the following	and Redacted
Certification, and	third parties: Snap, Inc. and Netflix, Inc.	Version Filed on
Memorandum in		Public Docket
Support		
Lawrence Decl. Ex. 1	Designated Confidential by Defendant Meta	Filed Under Seal
	Platforms, Inc.	
Lawrence Decl. Ex. 2	Designated Confidential by Defendant Meta	Filed Under Seal
	Platforms, Inc.	
Lawrence Decl. Ex. 3	Designated Confidential by Defendant Meta	Filed Under Seal
	Platforms, Inc.	
Lawrence Decl. Ex. 4	Designated Confidential by Defendant Meta	Filed Under Seal
	Platforms, Inc.	
Lawrence Decl. Ex. 5 Designated Confidential by Defendant Meta		Filed Under Seal
	Platforms, Inc.	
Lawrence Decl. Ex. 6	Designated Confidential by Defendant Meta	Filed Under Seal
	Platforms, Inc.	
Lawrence Decl. Ex. 7	Designated Confidential by Defendant Meta	Filed Under Seal
	Platforms, Inc.	
Lawrence Decl. Ex. 8 Designated Confidential by Defendant Meta		Filed Under Seal
Platforms, Inc.		
Lawrence Decl. Ex. 9	Designated Confidential by Defendant Meta	Filed Under Seal

Case 3:20-cv-08570-JD Document 642 Filed 09/15/23 Page 3 of 8

		Platforms, Inc.	
1	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta	Filed Under Seal
	10	Platforms, Inc.	Theu Onder Sear
2	Lawrence Decl. Ex.	Designated Confidential by third party Snap Inc.	Filed Under Seal
3	11	Designated Confidential by time party Snap file.	Thed Older Sear
4	Lawrence Decl. Ex. 12	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
5	Lawrence Decl. Ex.	Designated Confidential by third party Live Nation Worldwide, Inc.	Filed Under Seal
6	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
7	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta	Filed Under Seal
8	Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal
9	Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal
10	17 Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal
11	18 Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal
12	19	Platforms, Inc.	
13	Lawrence Decl. Ex. 20	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
14	Lawrence Decl. Ex. 21	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
15	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta	Filed Under Seal
16	Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal
17	23	Platforms, Inc.	
18	Lawrence Decl. Ex. 24	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
19	Lawrence Decl. Ex. 25	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
20	Lawrence Decl. Ex. 26	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
21	Lawrence Decl. Ex. 27	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
22	Lawrence Decl. Ex.	Designated Confidential by third party Netflix Inc.	Filed Under Seal
23	28 Lawrence Decl. Ex.	Designated Confidential by third party Netflix Inc.	Filed Under Seal
24	29		
25	Lawrence Decl. Ex. 30	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
26	Lawrence Decl. Ex. 31	Designated Confidential by third party Netflix Inc.	Filed Under Seal
27	Lawrence Decl. Ex. 32	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
28	32	Platforms, Inc.	

Case 3:20-cv-08570-JD Document 642 Filed 09/15/23 Page 4 of 8

1	Lawrence Decl. Ex. 33	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal	
2	Lawrence Decl. Ex. 34	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal	
3	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta	Filed Under Seal	
4	Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal	
5	36 Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal	
6	37 Lawrence Decl. Ex.	Platforms, Inc.		
7	38	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal	
8	Lawrence Decl. Ex. 39	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal	
9	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal	
10	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta	Filed Under Seal	
11	Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal	
12	42 Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal	
13	43 Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal	
14	44	Platforms, Inc.		
15	Lawrence Decl. Ex. 45	Designated Confidential by third party Alphabet Inc.	Filed Under Seal	
16	Lawrence Decl. Ex. 46	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal	
17	Lawrence Decl. Ex. 47	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal	
18	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta	Filed Under Seal	
19	48 Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal	
20	49 Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal	
21	50 Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by third party Alphabet Inc.	Filed Under Seal	
22	51			
23	Lawrence Decl. Ex. 52	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal	
24	Lawrence Decl. Ex. 53	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal	
25	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta	Filed Under Seal	
26	Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal	
27	55 Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal	
28	3			

Case 3:20-cv-08570-JD Document 642 Filed 09/15/23 Page 5 of 8

	56	DI (C. I	
1	56	Platforms, Inc.	D'1 111 1 0 1
	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta	Filed Under Seal
2	57	Platforms, Inc.	E'1 111 1 C 1
3	Lawrence Decl. Ex. 58	Designated Confidential by third party Alphabet Inc.	Filed Under Seal
4	Lawrence Decl. Ex. 59	Designated Confidential by third party Alphabet Inc.	Filed Under Seal
5	Lawrence Decl. Ex. 60	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
6	Lawrence Decl. Ex. 61	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
7	Lawrence Decl. Ex. 62	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
8	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
10	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
11	Lawrence Decl. Ex.	Designated Confidential by third party Alphabet Inc.	Filed Under Seal
12	Lawrence Decl. Ex.	Designated Confidential by third party Alphabet Inc.	Filed Under Seal
13	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
14	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
15	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
16 17	Lawrence Decl. Ex.	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
18	Lawrence Decl. Ex.	Contains Information Designated as Confidential by	Filed Under Seal
19	Lawrence Decl. Ex.	Defendant Meta Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal
20	Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal
21	Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal
22	Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal
23	76 Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal
24 25	77 Lawrence Decl. Ex.	Platforms, Inc. Designated Confidential by Defendant Meta	Filed Under Seal
	78	Platforms, Inc. Designated Confidential by Defendent Meta	Eilad Hadan Cast
26	Lawrence Decl. Ex. 79	Designated Confidential by Defendant Meta Platforms, Inc.	Filed Under Seal
27	Williams Decl. Ex. A	Contains Information Designated as Confidential by Defendant Meta Platforms, Inc. and the following	Filed Under Seal
28		Defendant Meta Flatfornis, inc. and the following 4	<u> </u>

1	third parties: Alphabet Inc; Hootsuite, Inc.; Linkedin Corp.; Microsoft Corp.; Twitter, Inc.; Snap Inc.				
2 3	Williams Decl. Ex. B Contains Information Designated as Confidential by Defendant Meta Platforms, Inc. and the following third parties: Alphabet Inc; Hootsuite, Inc.; Twitter,			Filed Under Seal	
4	Kreitzman Decl. Ex.		on Designated as Confidential by	Filed Under Seal	
5	A	Defendant Meta Pla	·	E'1 111 1 C 1	
6	Kreitzman Decl. Ex. B	Defendant Meta Pla	on Designated as Confidential by atforms, Inc.	Filed Under Seal	
7	Gans Decl. Ex. A		on Designated as Confidential by atforms, Inc. and third party Snap	Filed Under Seal	
8	Gans Decl. Ex. B Contains Information Designated as Confidential by Defendant Meta Platforms, Inc.		•	Filed Under Seal	
10	Fasser Decl. Ex. B		on Designated as Confidential by	Filed Under Seal	
11			,		
11 12	Dated: September 15, 2	2023	Respectfully submitted		
	•			,	
13 14	BATHALE DONNE ELI		SCOTT+SCOTT ATTORNEYS AT LAW LLP		
14					
15	/s/ Yavar Bathaee	2200)	/s/ Amanda F. Lawrence Amanda F. Lawrence (pro hac vice)		
16	Yavar Bathaee (CA 28 yavar@bathaeedunne.c		alawrence@scott.scott.com		
	Andrew C. Wolinsky (Patrick J. McGahan (<i>pro hac vice</i>)	
17	awolinsky@bathaeedu		pmcgahan@scott-scott.		
18	Adam Ernette (pro hac		Michael P. Srodoski (p		
10	aernette@bathaeedunn		msrodoski@scott-scott	msrodoski@scott-scott.com	
19	Priscilla Ghita (<i>pro hac</i> pghita@bathaeedunne.		•	156 South Main Street, P.O. Box 192	
20	Chang Hahn (pro hac vice) chahn@bathaeedunne.com		Colchester, CT 06415 Tel.: (860) 537-5537	Colchester, CT 06415 Tel.: (860) 537-5537	
21	445 Park Avenue, 9th l		Patrick J. Coughlin (CA	A 111070)	
22	New York, NY 10022 Tel.: (332) 322-8835		pcoughlin@scott-scott.		
22	1el (332) 322-6633		Carmen A. Medici (CA		
23	Brian J. Dunne (CA 27	(5689)	cmedici@scott-scott.co	· · · · · · · · · · · · · · · · · · ·	
	bdunne@bathaeedunne	· · · · · · · · · · · · · · · · · · ·	Hal D. Cunningham (C	CA 243048)	
24	Edward M. Grauman (hcunningham@scott-sc		
25	egrauman@bathaeedur	nne.com	Daniel J. Brockwell (C	*	
	Andrew M. Williamson		dbrockwell@scott-scot		
26	awilliamson@bathaeed 901 South MoPac Expr		600 W. Broadway, Suit San Diego, CA 92101	te 3300	
27	Barton Oaks Plaza I, S	•	Tel.: (619) 233-4565		
41	Austin, TX 78746	uite 500	101 (01 <i>7) 233-4303</i>		

5

1	Tel.: (213) 462-2772	Patrick J. Rodriguez (pro hac vice)	
2	Allison Watson Cross (CA 328596) across@bathaeedunne.com	prodriguez@scott-scott.com 230 Park Avenue, 17th Floor New York, NY 10169	
3	3420 Bristol St., Ste 600 Costa Mesa, CA 92626-7133	Tel.: (212) 223-6444	
4	Interim Co-Lead Counsel for the	Interim Co-Lead Counsel for the Advertiser Classes	
5	Advertiser Classes	Aavernser Classes	
6	LEVIN SEDRAN & BERMAN LLP	AHDOOT & WOLFSON, PC	
7	Keith J. Verrier (pro hac vice) kverrier@lfsblaw.com	Tina Wolfson (CA 174806) twolfson@ahdootwolfson.com	
8	Austin B. Cohen (pro hac vice)	Robert Ahdoot (CA 172098) rahdoot@ahdootwolfson.com	
9	acohen@lfsblaw.com 510 Walnut Street, Suite 500	Theodore W. Maya (CA 223242)	
10	Philadelphia, PA 19106-3997	tmaya@ahdootwolfson.com Henry J. Kelson (<i>pro hac vice</i>)	
11	Tel.: (215) 592-1500 Fax: (215) 592-4663	hkelston@ahdootwolfson.com	
12	1 dx. (213) 372-4003	2600 West Olive Avenue, Suite 500 Burbank, CA 91505	
	Members of Executive Committee for the Advertiser Classes	Tel.: (310) 474-9111	
13	naveruser classes	Fax: (310) 474-8585	
14 15		Members of Executive Committee for the Advertiser Classes	
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

CERTIFICATE OF SERVICE I hereby certify that on September 15, 2023, I caused a true and correct copy of the foregoing document to be served by electronic mail on all counsel of record. Dated: September 15, 2023 By: <u>/s/Amanda F. Lawrence</u> Amanda F. Lawrence